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2 Nevada State Bar No. 11479
RAQUEL LAZO
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6 Attorney for Omar Espitia-Marquez

7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9 UNITED STATES OF AMERICA,

10 Plaintiff,

11 v.

12 OMAR ESPITIA-MARQUEZ,

13 Defendant.

Case No. 2:23-cr-00112-APG-VCF-1

**STIPULATION TO CONTINUE
WAIVER OF INDICTMENT, PLEA,
AND SENTENCING HEARING**
(First Request)

14
15 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,
16 United States Attorney, and Kimberly Frayn, Assistant United States Attorney, counsel for the
17 United States of America, and Rene L. Valladares, Federal Public Defender, and Raquel Lazo,
18 Assistant Federal Public Defender, counsel for Omar Espitia-Marquez, that the Waiver of
19 Indictment, Plea, and Sentencing Hearing currently scheduled on September 21, 2023, be
20 vacated and continued to November 1, 2023 at 11:00 a.m.

21 This Stipulation is entered into for the following reasons:

- 22 1. Additional time is needed to review the presentence investigation report with
23 Mr. Espitia-Marquez.
- 24 2. Defendant is incarcerated and does not object to a continuance.
- 25 3. Additionally, denial of this request for continuance could result in a
26 miscarriage of justice.

1 This is the first request for continuance filed herein.

2 DATED this 13th day of September, 2023.

3
4 RENE L. VALLADARES
Federal Public Defender

JASON M. FRIERSON
United States Attorney

5
6 By: Raquel Lazo

7 RAQUEL LAZO
8 Assistant Federal Public Defender

By: Kimberly Frayn

KIMBERLY FRAYN
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 OMAR ESPITIA-MARQUEZ,

7 Defendant.

Case No. 2:23-cr-00112-APG-VCF-1

ORDER

9
10 Based on the Stipulation of counsel and good cause appearing,

11 IT IS THEREFORE ORDERED that the Waiver of Indictment, Plea, and Sentencing
12 Hearing currently scheduled on September 21, 2023, be vacated and continued to
13 November 1, 2023 at 11:00 a.m.

14 DATED this 14th day of September, 2023.

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17 UNITED STATES DISTRICT JUDGE